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*Counsel to the Ad Hoc Group of
Individual Victims*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: :
PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649-RDD
: (Jointly Administered)
Debtors.¹ :
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**VERIFIED STATEMENT OF THE AD HOC GROUP OF INDIVIDUAL VICTIMS
OF PURDUE PHARMA L.P., ET AL., PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Ad Hoc Group of Individual Victims of Purdue Pharma L.P. (the “Ad Hoc Group”) holding general unsecured claims in the above-captioned chapter 11 cases of Purdue Pharma L.P., *et al.* (collectively, the “Debtors”), hereby submits this verified statement (the “Verified Statement”) and in support thereof states:

1. In October 2019, the Ad Hoc Group was formed. The Ad Hoc Group members each retained ASK LLP to represent them in connection with the Debtors’ chapter 11 cases.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

2. The members of the Ad Hoc Group hold claims against the Debtors' estates.²
3. The Ad Hoc Group members are as follows:
 - **Kathleen ("Kay") Scarpone.** Kay's son, Sgt. Joseph Scarpone, served in the United States Marine Corps from 2007 to 2011 and had a one year tour in Afghanistan during that time. A combination of PTSD and opioid use led to his death in 2015. Kay serves on the Board of Directors of Team Sharing, Inc., a national nonprofit organization dedicated to parents who have lost a child to Substance Abuse Disorder ("SUD"). Team Sharing provides grief services, advocacy, community activism and a benevolence program for those in need of burial services. Team Sharing was instrumental in obtaining the proclamation of August 31 as National Overdose Awareness Day. Kay has traveled to Washington DC to meet with the Interim Director of the Drug Enforcement Administration to share her concerns with respect to furthering education regarding substance abuse for our youth.
 - **Robert F. List, Esq.** Robert F. List, Esq. served as the 24th Governor of Nevada from 1979 to 1983. Prior to being elected Governor, he served for eight years as the elected Attorney General of Nevada, following his service as the District Attorney of Carson City. He was Chairman of both the Western Governors' Association and the Conference of Western Attorneys General and served as President of the Nevada District Attorneys Association. Governor List is Senior Partner in the Las Vegas law firm of Kolesar & Leatham, where he focuses on public policy and government relations for corporate and business clients on the federal, state, and local levels. He has served as a Presidential or Cabinet Member appointee to boards and commissions under six U.S. Presidents. Governor List is an advocate for victims of the opioid epidemic. He serves as an advisory board member of The Recovery Advocacy Project and he is also affiliated with the Nevada Recovery PAC, The Foundation for Recovery, and Hope for Prisoners. In 2019, he was designated as a Distinguished Nevadan by the Board of Regents of the University of Nevada, the University System's highest honor. Governor List received his B.S. degree from Utah State University and his Juris Doctor degree from the University of California, Hastings College of the Law. Governor List serves as an agent for individual victims of Purdue who have elected to remain anonymous. Anonymity is widely recognized as an important component of the right to privacy of those in addiction.
 - **Jill Cichowicz.** Jill lost her twin brother, Scott, to an accidental overdose in February 2017. Scott was prescribed OxyContin in connection with a back injury he sustained in 2014 and he became addicted immediately. Scott entered treatment, but he relapsed after he was released. Jill founded The Scott Zebrowski Scholarship Fund at the McShin Foundation to help those suffering from SUD to receive services that they could not afford otherwise. The Fund recently won the Richmond Times Dispatch Best Charity of 2019. The Fund hosts monthly events to give back to the community, such as serving dinner to individuals in recovery at The Healing Place, volunteering at the Chesterfield Food Bank, mentoring the women in the HARP Program at the Chesterfield County Jail, and collecting items for those in recovery. Jill also educates others through the website www.anightforscott.com.

² The Ad Hoc Group members are individuals who have been injured by the Debtors' opioid products.

- **Fred Muench.** Fred is the President of Center on Addiction, and formerly was President and CEO of the Partnership for a Drug-Free America and the Partnership for Drug-Free Kids. Fred is a clinical psychologist who specializes in developing remote coaching and digital interventions to help individuals and families prevent substance misuse and intervene when a problem occurs. Fred has held faculty appointments at NYU, Columbia University Medical Center and the Feinstein Institute for Medical Research. Fred, who is in recovery for addiction, has worked in the addiction field for more than 20 years as a clinician and implementation scientist pushing the boundaries of bringing addiction treatment directly to individuals and families. The Center on Addiction reaches tens of millions of people a year through their national media campaigns, website resources, mobile interventions, and one-on-one family services.
- **Diana (“Dede”) Yoder.** Dede was a single mom who raised her only child, Chris, in suburban New York. Chris loved extreme sports such as snowboarding, skateboarding, downhill mountain biking and more. As a result of such sports, Chris had several knee injuries which led to surgeries when he was 14 years old, followed by an emergency appendectomy when he was 15. His doctors prescribed opioid painkillers after each operation and Chris became addicted. Eventually, Chris attempted rehab, enrolling in 8 different programs over 4 years. In 2017, however, after a year of being in recovery, Chris relapsed and died. He was 21 years old. Dede received the call that her son had passed away while in Paris on business. It took her 9 hours to fly home to arrange the funeral for her only child. Dede is currently an Ambassador for Shatterproof, a national nonprofit organization dedicated to ending the devastation that opioid addiction causes families. Shatterproof works on policy change, new federal legislation, programs that educate and empower families, workplaces, and the general public, evidence-based standards of care for addiction, and initiatives to drive payment reform and accountability.
- **Garrett Hade.** Garrett was prescribed OxyContin at the age of 18 for minor injuries sustained while skateboarding. He became addicted to these pills and his addiction impacted his life for more than 10 years. Garrett found recovery in 2015. After losing multiple friends to drug overdoses around that same time, Garrett became involved in recovery advocacy. He is a founding member of The Voices Project, a non-profit organization dedicated to shattering the stigma associated with addiction and empowering others to share their own stories. Garrett has spent the last few years traveling around the country visiting communities affected by the disease of addiction. He visits prisons, jails, hospitals and treatment centers, and he advocates for better access to care, ethical standards in the treatment industry, criminal justice reform, and access to life saving medications. Garrett is also dedicated to advocating and advancing policy reforms for the treatment of SUD, helping to pass both state and federal laws that protect people who have suffered from opiate addiction. The Voices Project reaches over one million people per week.
- **Will Allphin.** Will worked in the aerospace industry as a Process/MFG/Quality Engineer and Audit liaison for several aerospace manufacturers. He has worked with the United States Department of Defense, Boeing, Lockheed Martin and Learjet, among others, to ensure procedural/specification compliance. Will was prescribed OxyContin in connection with back injuries he sustained. What began as dependence, ended with the loss of jobs, family and nearly the loss of his life through overdose. There was a point when Will was

spending upwards of \$800 a day on his OxyContin addiction. Fortunately, Will has sustained recovery. He changed the focus of his life's work towards the SUD and recovery fields based on his desire to give back after having lost more than 20 friends in a period of a just a few years to the opioid crisis. Will is currently the Director of Programs for the Foundation for Recovery in Las Vegas, NV. The Foundation's mission is to foster a safe and supportive environment for peer-centered education, services and engagement. Its programs and partnerships open pathways to recovery by removing social barriers and creating opportunities for those seeking and maintaining long-term recovery.

- **Lindsey Arrington.** Lindsey was first introduced to OxyContin as a minor and she became addicted. After enrolling in numerous treatment facilities, having her son taken away from her by child protective services, and almost losing her life, she was able to recover and she has been in recovery for eight years. In 2013, Lindsey founded Hope Soldiers, a non-profit organization based in Everett, Washington, whose mission is to help individuals and families affected by the OxyContin epidemic. Hope Soldiers' efforts have been featured in the national media and on MTV and were formally recognized by the White House.

4. In accordance with Bankruptcy Rule 2019, a list of the names, addresses and the nature and amount of all disclosable economic interests held in respect of the Debtors, as of October 22, 2019, by each member of the Ad Hoc Group is attached hereto as **Exhibit A**. The information set forth on **Exhibit A** is based on information provided by the members of the Ad Hoc Group and is intended to comply with Bankruptcy Rule 2019 and is not intended for any other purpose. The members of the Ad Hoc Group make no representation with respect to the amount, allowance, validity, secured status, or priority of such claims and reserves all rights with respect thereto.

5. Nothing contained in this Statement (or **Exhibit A** hereto) should be construed as a limitation upon, or waiver, of any Ad Hoc Group member's right to assert, file, and/or amend its claim(s) in accordance with applicable law and any orders entered in these cases establishing procedures for filing proofs of claim.

6. The Ad Hoc Group reserves the right to amend and/or supplement this Verified Statement in accordance with Bankruptcy Rule 2019.

Dated: New York, New York
October 25, 2019

ASK LLP

/s/ Edward E. Neiger

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